

NORTHWEST POWER PLANNING COUNCIL

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September 29, 2000

Mr. Brian Brown
Assistant Regional Administrator
Hydro Division
National Marine Fisheries Service
525 N.E. Oregon Street, Suite 500
Portland, Oregon 97232

Dear Mr. Brown:

The Council has received the Draft Biological Opinion on the Operation of the Federal Columbia River Power System dated July 27, 2000. As the regional agency charged with to balance and plan for the fish and wildlife and energy needs of the Columbia basin, the Council appreciates the significant amount of work that the Draft represents. Moreover, the Draft Biological Opinion presents a considerable amount of information for the Council to consider as it prepares to amend its Columbia River Fish and Wildlife Program. We have appreciated the comments and contributions that we have received from NMFS in our program amendment process. The Council will carefully consider those comments and the Draft Biological Opinion as we amend our program.

The Council anticipates providing comments to NMFS on its Draft Biological Opinion in mid to late October. This timing is necessitated by the fact that the Council cannot consider and endorse comments as a full Council until its October 10th - 12th meetings in Portland. I am hopeful that you will find the Council's comments useful notwithstanding their submission after the requested date. I anticipate that the Council will have comments that address and expand upon at least the following five matters:

1. *Coordinating the implementation of the actions called for in the Final Biological Opinion/Reasonable and Prudent Alternative with the implementation of the regional Columbia River Fish and Wildlife Program.* Our respective staffs have been meeting to discuss the ways to effectively integrate ESA based needs into the annual regional process wherein decisions are made regarding Bonneville's fish and wildlife expenditures. I am advised that those meetings have been productive, and I anticipate that our comments will provide more information on the ideas that our staffs have been discussing.

2. *Bonneville's responsibility for funding actions called for in the Biological Opinion/Reasonable and Prudent Alternative and the "All H" paper.* The Council is concerned that these draft documents suggest an ESA action funding role for Bonneville, and thus the regional ratepayers, that does not adequately recognize the fact that ESA purposes and objectives are national.

3. *Performance standards.* The Council may choose to comment on the performance standards that have been proposed for evaluating the effectiveness of implementing the actions called for in the Draft. I anticipate that the Council will place particular emphasis on the performance standards that apply to the off-site mitigation program, which appear to be the least developed at this point.

4. *The effect of assumptions made about the relationship between the effectiveness of spawning salmon of hatchery and average population growth rates (λ).* Table 9.2-1- of the Draft presents a table that suggests that there is an inverse relationship between the effectiveness of hatchery origin spawners, and the growth rate of listed populations. There are a host of questions and issues that arise from the presentation of that table. Not the least of which is the apparent inconsistency between the analysis and conclusions implied in the table and the actions called for by NMFS and the federal caucus to utilize artificial production actions to help achieve survival and recovery of listed species.

5. *The Council will also comment on the power impacts associated with the hydrosystem operation standards and actions.* For example, our analysis suggests that flow measures for listed chum salmon have significant power implications for the system. I expect that this and other products of our analysis will be presented.

I hope that this summary and notice is helpful to you. I look forward to transmitting our comments to you on behalf of the full Council in October, and trust that you will find those helpful as you proceed to finalize the document.

Sincerely,

Stephen L. Crow.
Executive Director